

Dave Carter, Chairperson  
National Organic Standards Board  
USDA National Organic Program  
1400 Independence Ave. SW  
Washington, D.C. 20250-0020

May 4, 2002

Dear Chairperson Carter and NOSB members,

As a former representative of processors on the NOSB I would ask you to please consider allowing the use of Diethylaminoethanol (DEAE) with a sunset phase out for use as a treatment for boiler water steam in organic processing.

Allowance or prohibition of volatile amines in steam used for organic processing has had a murky history in regards to certifier standards. The National Organic Standards Board, in 1995, recommended that no boiler water additives should come in contact with organic food during production as part of the organic GMP recommendations. This prohibition was based partly on the mistaken information that all boiler water additives could be removed using in-line steam traps and filters. Based on this recommendation, almost all certifiers have adopted standards that have prohibited volatile amines. However, the survey of certifiers conducted by the NOSB processing committee in 2001 revealed that the two certifiers that certify the bulk of processors routinely provide variances to production facilities that have difficulty complying with the prohibition of volatile amines. A separate survey, also conducted by the NOSB processing committee in 2001, revealed that approximately 20-25% of the 56 processors surveyed were given variances to use volatile amines during the processing of organic food. The same survey revealed that another 40% of the processors routinely use volatile amines but felt comfortable turning off the amines because the organic production runs have typically been short. It should be noted that for the bulk of the processors less than 5% of their production was organic food and that only one processor had installed equipment to alleviate the need for boiler water chemicals. So, in fact, there has been a historical allowance for volatile amines when production facilities felt that shutting them off would jeopardize the integrity of their equipment.

I personally feel very strongly that volatile amines are not consistent with long-term organic standards just as many of the inert materials used in the crops and livestock sectors are inconsistent with our view of the ideal organic standards. However, the processing industry needs time to phase out the use of volatile amines. Processors with severe water quality issues (high levels of carbonates) that process only a small amount of organic food as part of their overall percentage of production will not be willing to spend the additional \$50,000-\$200,000 for equipment to allow production without use of volatile amines.

The vast majority of organic food companies contract with plants to produce organic food. They need to be able to source processors that are close to the production fields and that are able to produce a wide array of products in order to continue the growth of the organic industry. The immediate prohibition of volatile amines in processing will severely hinder an organic food company's ability to find a processor to process organic food.

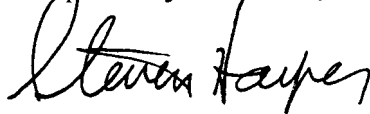
The TAP reviewers, in evaluating volatile amine materials, called for a prohibition of volatile amines without regard to viable alternatives. A subsequent independent review of the TAP reviews requested by the NOSB in Summer 2001 noted, however, that one of the shortcomings of the TAP reviews was "the incomplete identification of alternatives." Viable alternatives is one of the criteria that needs to be considered when evaluating materials and especially needs to be considered when the impact affects 20-25% of the processing industry.

DEAE is the volatile amine that is most universally applicable to a wide variety of processing plants. It is the only alternative remaining that is being considered. There have been concerns noted in regards to its safety. Analysis of the FOIA material from the FDA on DEAE revealed no toxicological concerns and an estimation that food prepared directly with steam containing 10 ppm of DEAE would contain no more than 0.5 ppm of the additive in the final product. This level is far below that of a typical food additive or processing aid.

I hope that all of the NOSB board members have a chance to review the comments from the six or seven processors that have submitted comments regarding the need for a short-term allowance for DEAE. Please consider the effect that immediate prohibition will have on the ability to process organic food and to continue the current growth of the industry. Short term allowance with a sunset clause would send a strong message to the industry that alternatives must be put in place.

Thank you for your consideration of this material.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Steven Harper". The signature is fluid and cursive, with the first name "Steven" being more prominent than the last name "Harper".

Steven Harper PhD  
Director of R&D  
Small Planet Foods